

1 MICHAEL D. LONG (CA State Bar #149475)
2 901 H Street, Suite 301
3 Sacramento, CA 95814
4 (916) 201-4188
5 Mike.Long.Law@msn.com

6 Attorney for ADAN NAVARRO

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,) No. 2:21-191 KJM
Plaintiff,)
v.) STIPULATION AND ~~PROPOSED~~
ADAN NAVARRO,) ORDER TO TEMPORARILY
Defendant.) AMEND ADAN NAVARRO'S
====) CONDITIONS OF RELEASE
====)) Date:
====) Time:
====) Judge: Hon. Magistrate Jeremy D. Peterson
====)

Adan Navarro's special conditions of pre-trial release are found in ECF document 23, as amended in ECF documents 47 and 48. The parties agree it is appropriate to modify Special Condition 16, temporarily, to read:

“16. CURFEW: On the nights of December 24-25, 25-26, 2022, and December 31, 2022 – January 1, 2023, you must remain inside your residence every day from 12:30am to 5:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or court-ordered obligations.”

Please note that on the evenings of December 24, 25 and 31, 2022, Adan Navarro will be at family gatherings in the same apartment complex in which he currently resides.

IT IS HEREBY STIPULATED AND AGREED between the defendant Adan Navarro, by and through her undersigned defense counsel, and the United States of America, by and through

1 its counsel, Assistant U.S. Attorney David Spencer, that Special Condition 16 should be modified
2 as written above.

3 I have spoken to PTS Rene Basurto. She does not oppose this modification of Special
4 Condition 16. The newly Amended Condition is attached to this document.

5
6
7 Dated: December 22, 2022

Respectfully submitted,

8 */s/ Michael D. Long*
9 MICHAEL D. LONG
10 Attorney for Adan Navarro

11 Dated: December 22, 2022

PHIL TALBERT
12 United States Attorney

13 */s/ David Spencer*
14 DAVID SPENCER
15 Assistant U.S. Attorney

16 ~~PROPOSED~~ ORDER

17 **GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.**

18 The Court hereby orders Special Condition 16, to read, temporarily, as follows:

20 “16. CURFEW: On the nights of December 24-25, 25-26, 2022, and December 31, 2022 – January
21 1, 2023, you must remain inside your residence every day from 12:30am to 5:00am, or as adjusted
22 by the pretrial services officer for medical, religious services, employment or court-ordered
23 obligations.”

25 Dated: December 22, 2022

26
27 
28 Hon. JEREMY D. PETERSON
United States Magistrate Judge